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U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

SDD:AAS
F.#2014R00564

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

YING LIN,
also known as "Randi Lin" and
"Randy Lin,"

Cr. No. **CR 15 601**
(T. 31, U.S.C. §§ 5317(c) and 5324(a)(3); T.
21, U.S.C. § 853(p); T. 18, U.S.C., §§ 2 and
3551 et seq.)

Defendant.

IRIZARRY, J.

- - - - -X

THE GRAND JURY CHARGES:

ORENSTEIN, M.J.

STRUCTURING FINANCIAL TRANSACTIONS

1. At all times relevant to this Indictment, the currency reporting requirements were as follows:

(a) Domestic financial institutions were required to file a Currency Transaction Report ("CTR") with the Internal Revenue Service for each "deposit, withdrawal, exchange of currency or other payment or transfer, by, through, or to such financial institution which involves a transaction in currency of more than \$10,000," pursuant to Title 31, United States Code, Section 5313(a) and Title 31, Code of Federal Regulations, Section 1010.311.

(b) "Structuring" a financial transaction meant the breaking down of a sum of currency exceeding \$10,000 into smaller amounts of \$10,000 or less prior to transacting business with a domestic financial institution in an attempt to evade currency

reporting requirements, as defined in Title 31, Code of Federal Regulations, Section 1010.100(xx).

2. On or about and between August 24, 2010 and August 24, 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant YING LIN, also known as “Randi Lin” and “Randy Lin,” together with others, for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations prescribed thereunder, did knowingly and intentionally structure and assist in structuring transactions with one or more financial institutions, to wit: HSBC Bank USA, N.A., and TD Bank, N.A., by making and causing to be made cash transactions in individual amounts of less than \$10,000, but in aggregate amounts of in excess of \$10,000, to evade the currency transaction reporting requirements.

(Title 31, United States Code, Section 5324(a)(3); Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon her conviction of the offense charged above, the government will seek forfeiture in accordance with 31 U.S.C. § 5317(c), which requires any person convicted of such offense to forfeit any property, real or personal, involved in such offense and any property traceable thereto.

4. If any of the above described forfeitable property, as a result of any act or omission of the defendant;

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;

- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;


it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 31, United States Code, Section 5317(c); Title 21, United States Code, Section 853(p))



ROBERT L. CAPERS
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

A TRUE BILL



FOREPERSON

F. #2014R00564
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.


YING LIN,

Defendant.

INDICTMENT

(T. 31, U.S.C. §§ 5317(c) and 5324(a)(3); T. 21, U.S.C. § 853(p);
T. 18, U.S.C., §§ 2 and 3551 et seq.)

A true bill.

 _____
Foreperson

Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Alexander A. Solomon, Assistant U.S. Attorney (718) 254-6074